

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION

UNITED STATES OF AMERICA ) CRIMINAL CASE NO: 2:18-cr-264  
                              )  
                              )  
                             vs.  )  
                              )  
ANTTWON HAYNES,          ) MOTION TO PRODUCE AND SUPPRESS  
                              ) INTERCEPTIONS OF WIRE OR ORAL  
                             Defendant.  )  
                              )  
                              )

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The defendant, Anttwon Haynes, through his undersigned attorney, hereby moves the Court for an Order directing:

1. The disclosure of all intercepted wire or oral communications and the suppression of the contents of any or all evidence in any way derived therefrom, where the defendant or his alleged agents were parties to such communications or where such interception was directed against the defendant or his alleged agents;
2. The disclosure of all intercepted wire or oral communications and the production and suppression of the contents of any and all unlawfully intercepted wire or oral communications of any of the officers, agents, employees, or attorneys of the defendant, any company or firm of which he has an ownership, interest or manages or directs, or any such companies' subsidiaries and all evidence in any way derived from such interceptions;
3. The production for inspection and copying of any transcripts of recordings of any communications obtained by the use of any listening devices or other electronic surveillance, where the interception was the result of any investigation directed against the defendant or his agents;
4. The production for inspection and copying of any transcripts or recordings

of any communications of any officers, agents, employees, or attorneys of any company with which the defendant is associated, or any of their subsidiaries, obtained by the use of any listening devices or other electronic surveillance;

5. The production for inspection and copying of all recordings, transcripts, writings or tangible things whatsoever within the possession, custody or control of the Government derived directly or indirectly from, or relating to, the interception of any communication in the course of which the voice of the defendant or any officer, agent, employee or attorney of any company with which the defendant is associated, or any of their subsidiaries, was overheard, or which communication was conducted when any such person was present.

Respectfully submitted,

s/G. Wells Dickson, Jr.

**G. WELLS DICKSON, JR.**

Wells Dickson, P.A.

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ATTORNEY FOR THE DEFENDANT,

ANTTWON HAYNES

Kingstree, South Carolina  
August 20, 2019

#### CERTIFICATE OF SERVICE

I hereby certify that on this date I caused one true copy of the written document to be served in the above-captioned case, via the court's e-noticing system, but if that means failed, then by regular mail, on all parties of record.

s/ G. Wells Dickson, Jr.

G. Wells Dickson, Jr.